

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI, MARY BLY, MICHAEL CONNELLY, SYLVIA DAY, JONATHAN FRANZEN, JOHN GRISHAM, ELIN HILDERBRAND, CHRISTINA BAKER KLINE, MAYA SHANBHAG LANG, VICTOR LAVALLE, GEORGE R.R. MARTIN, JODI PICOULT, DOUGLAS PRESTON, ROXANA ROBINSON, GEORGE SAUNDERS, SCOTT TUROW, and RACHEL VAIL, individually and on behalf of others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, and OPENAI STARTUP FUND MANAGEMENT LLC,

Defendants.

No. 1:23-cv-08292-SHS-OTW

JONATHAN ALTER, KAI BIRD, TAYLOR BRANCH, RICH COHEN, EUGENE LINDEN, DANIEL OKRENT, JULIAN SANCTON, HAMPTON SIDES, STACY SCHIFF, JAMES SHAPIRO, JIA TOLENTINO, and SIMON WINCHESTER, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LCC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendants.

No. 1:23-cv-10211-SHS-OTW

DEFENDANTS’ MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Section IV of this Court’s Individual Practices in Civil Cases, defendants OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, and OpenAI Holdings, LLC (collectively, “OpenAI”) seek leave to file under seal:

- Limited portions of OpenAI’s Opposition to Plaintiffs’ letter brief regarding Plaintiffs’ requests for production of documents on the Data Working Group (“DWG Opp.”) that reference or summarize confidential materials;
- Limited portions of the Declaration of Ashley Pantuliano (“Pantuliano Declaration” or “Pantaliano Decl.”) in support of the DWG Opp. that reference or summarize confidential materials; and
- Exhibit C to the Pantuliano Declaration, which contains business information or communications that have been designated as confidential or highly confidential pursuant to the Protective Order in this case (ECF No. 148).

For the reasons stated in OpenAI’s accompanying memorandum of law, which is also submitted in support of OpenAI’s Response to Plaintiff’s Motion for Leave to File Under Seal, OpenAI respectfully requests the Court grant its motion for leave to file under seal.

Dated: November 22, 2024

Respectfully Submitted,

By: /s/ Vera Ranieri

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